

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

BIAGIO RAVO and ENRICO NICOLO,)	Civil Action No. 2:11-CV-01637-JFC
)	
Plaintiffs,)	Chief Judge Joy Flowers Conti
)	
v.)	Pittsburgh Division
)	
COVIDIEN, LP,)	
)	
Defendant.)	

JOINT STIPULATION AND MOTION FOR DISMISSAL

Pursuant to Federal Rule of Civil Procedure, 41, Plaintiffs Biagio Ravo and Enrico Nicolo ("Plaintiffs") and Defendant Covidien LP ("Covidien"), jointly move for an order of dismissal based on the stipulations below.

1. Plaintiffs' claims against Covidien and defenses to Covidien's counterclaims are dismissed with prejudice.
2. Covidien's defenses and counterclaims against Plaintiffs are dismissed with prejudice.
3. Each party shall bear its own costs and attorneys' fees in this action.
4. The provisions of the protective order entered in this action shall remain in full force pursuant to its terms.

A proposed order is attached.

Respectfully submitted,

By: /s/ Eric S. Newman

Daniel M. Darragh (Pa. ID No. 34076)
Eric S. Newman (Pa. ID No. 89949)
COHEN & GRIGSBY, P.C.
625 Liberty Avenue
Pittsburgh, PA 15222-3152
Telephone: (412) 297-4900
E-mail: ddarragh@cohenlaw.com;
enewman@cohenlaw.com

Timothy R. DeWitt
24IP Law Group USA, PLLC
222 Severn Ave., Suite 48
Building 1, 1st Floor
Annapolis, MD 21403
Telephone: (410) 212-2539
E-mail: tdewitt@24ipUSA.com

Counsel for Plaintiffs Biagio Ravo
and Enrico Nicolo

Dated: June 4, 2015
2125026.v1

By: /s/ Stacy A. Baim

Eric G. Soller, Esq. (Pa. ID No. 65560)
PIETRAGALLO GORDON ALFANO
BOSICK & RASPANTI, LLP
One Oxford Centre, 38th Floor
Pittsburgh, PA 15219
Telephone: (412) 263-2000
Email: egs@pietragallo.com

Michael D. Switzer (Il. ID No. 6297747)
Brian C. Bianco (Il. ID No. 6281029)
Stacy A. Baim (Il. ID No. 6257018)
AKERMAN LLP
71 South Wacker Drive, 46th Floor
Chicago, Illinois 60606
Telephone: (312) 634-5700
E-mail: michael.switzer@akerman.com;
brian.bianco@akerman.com;
stacy.baim@akerman.com

Counsel for Defendant Covidien LP

CERTIFICATE OF SERVICE

I hereby certify that on 4th day of June 2015, I caused the foregoing JOINT STIPULATION AND MOTION FOR DISMISSAL to be electronically filed with the Clerk of the Court by using the CM/ECF system, which will send a notice of filing to counsel of record.

/s/ Eric S. Newman